Message

From: Harrington, Arthur [ajharrin@gklaw.com]

Sent: 5/18/2020 5:55:45 PM

To: Gross, Louise C [gross.louise@epa.gov]

CC: Bonar-Bridges, James I - DNR [james.bonarbridges@wisconsin.gov]; Schaufelberger, Daniel

[schaufelberger.daniel@epa.gov]; Tania.Taff@wisconsin.gov

Subject: RE: New Water: Follow-up Questions [GK-Active.FID2939509]

Attachments: Gross 05182020 GAC Info request EPA.pdf; 01 GAC Carbon Analysis Baseline 05 18 2018.pdf; 02 GAC Carbon Sample

Results-12-07-2018.pdf; 03 Badger lab results GAC carbon 01 17 2019 Sulfur PERCENT.pdf; 04 Badger Lab Report GAC Carbon 02 19 2019.pdf; 05 SGS GAC Carbon results 03 18 2019 and 05 05 2019.pdf; 08 Instrument calibrations Initial.pdf; 09 2019-2020 Calibrations.pdf; 06 GAC Total Sulfur - Free sulfur recalculated.xlsx; 07 - 04192019 to 10192019 GAC HOURLY REPORT Block Average.xlsx; 10 - 04192019 to 10192019 WET SCRUBBER HOURLY

REPORT.xlsx

Louise;

I have attached the response from NEW Water to your 4/13/20 request for documents. I, of course, included James on this e-mail. Also, hope you don't mind that I have included Dan and Tania on this e-mail as well.

Feel free to call me if you have any questions after reviewing the attached.

Best regards,

Art

Arthur Harrington | Attorney 414.287.9414 direct 414.588.3908 mobile ajharrin@gklaw.com

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From: Gross, Louise C <gross.louise@epa.gov>

Sent: Monday, April 13, 2020 2:51 PM

To: Harrington, Arthur <ajharrin@gklaw.com>

Cc: Bonar-Bridges, James I - DNR <james.bonarbridges@wisconsin.gov>

Subject: New Water: Follow-up Questions

[EXTERNAL] This message originated from outside your domain.

Art,

As a follow-up to our 4/8/20 conversation, and in furtherance of our settlement efforts, we request that New Water provide the following:

- The results from the granulated activated carbon (GAC) sulfur weight percent measurements required by the August 1, 2018 Alternative Monitoring Plan (AMP) approval letter from EPA Region 5.
 - The AMP required monthly measurements for the first three months following fluidized bed incinerator (FBI) startup, followed by measurements every six months thereafter. The FBI began operating on May 8, 2018 and the GAC failure occurred on November 7, 2019. So, the FBI/GAC operated for 18 months prior to GAC failure, which should result in at least four total analyzed carbon samples.
- GAC differential temperature and differential pressure measurements for the six-month period of FBI/GAC operation prior to the GAC system failure.
- The annual temperature and differential pressure sensor/transmitter calibration reports from 2018 and 2019.
- The scrubber liquid pH and flow rate readings for the six-month period of FBI operation prior to the GAC system failure.

Once EPA has had a chance to review this information and consult with WDNR, I will get back to you to discuss next steps.

In the meantime, stay safe.

Thanks.

Louise

Louise C. Gross Associate Regional Counsel U. S. Environmental Protection Agency 77 W. Jackson Blvd. (C-14J) Chicago, IL 60604 (312) 886-6844